

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
CHARLOTTESVILLE DIVISION**

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BABY DOE, A CITIZEN OF AFGHANISTAN	:
CURRENTLY RESIDING IN NORTH	:
CAROLINA, BY AND THROUGH NEXT	:
FRIENDS, JOHN AND JANE DOE; AND JOHN	:
AND JANE DOE, CITIZENS OF AFGHANISTAN:	:
AND LEGAL GUARDIANS OF BABY DOE,	:
	:
Plaintiffs,	:
	:
v.	:
	:
JOSHUA MAST, STEPHANIE MAST, RICHARD	:
MAST, KIMBERLEY MOTLEY, AND AHMAD	:
OSMANI,	:
	:
Defendants,	:
	:
and	:
	:
UNITED STATES SECRETARY OF STATE	:
ANTONY BLINKEN AND UNITED STATES	:
SECRETARY OF DEFENSE GENERAL	:
LLOYD AUSTIN,	:
	:
Nominal Defendants.	:
-----X	

DOE PLAINTIFFS' MOTION FOR LEAVE
TO PROCEED UNDER PSEUDONYMS
AND FOR ENTRY OF A PROTECTIVE ORDER

Plaintiffs, by counsel, respectfully move for leave to proceed under pseudonyms in this action. Plaintiffs further move for the entry of a Protective Order prohibiting Defendants, counsel, or any other interested or involved parties from disclosing Plaintiffs' identities or the locations of their habitual residence in Afghanistan. The grounds for this Motion are explained in

the accompanying Memorandum of Law in Support of Plaintiffs' Motion to Proceed Under Pseudonyms. A proposed Order is attached as Exhibit C to the Memorandum of Law.

Dated: September 2, 2022

Respectfully submitted,

/s/ Maya Eckstein

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CERTIFICATE OF SERVICE

I hereby certify that on the 2nd day of September 2022, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of such filing to all CM/ECF participants and further certify that a copy was sent via US mail to the following:

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